

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MAUREEN SULLIVAN-STEMBERG

Plaintiff,

v.

TURNER CONSTRUCTION COMPANY,
NISHIMATSU CONSTRUCTION CO., LTD.,
RAYMOND DEVELOPMENT, INC.,
MNOP CORPORATION,
JOHN F. HAYES, INDIVIDUALLY AND AS
PRESIDENT OF MNOP CORPORATION, AND
FLAGSHIP WHARF CONDO ASSOCIATION

Defendants.

Civil Action No.
04-10298 WGY

**ASSENTED TO MOTION TO ADMIT DAVID E. ROSENGREN
TO APPEAR AS COUNSEL IN THESE PROCEEDINGS
PRO HAC VICE FOR TURNER CONSTRUCTION COMPANY**

The Defendant, Turner Construction Company ("Turner") requests that David E. Rosengren, Esquire be permitted to make an appearance in this matter on the grounds set forth below:

1. Mr. Rosengren is a partner in the law firm of Pepe & Hazard LLP. Mr. Rosengren is a member in good standing of the Bars of the highest court of the State of Connecticut and the Commonwealth of Massachusetts, the United States Claims Court, the United States District Court for the District of Connecticut and the Second Circuit Court of Appeals.
2. Mr. Rosengren is a member in good standing in every jurisdiction in which he has been admitted to practice.

3. There are no disciplinary proceedings pending against Mr. Rosengren as a member of the bar in any jurisdiction.

4. Mr. Rosengren is familiar with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Massachusetts.

5. Mr. Rosengren is a person of upstanding character and commendable legal ability.

6. Neil S. Cohen, counsel for the Plaintiff, has been contacted regarding Mr. Rosengren's admission *pro hac vice* and Attorney Cohen assents to this motion.

7. An affidavit of David E. Rosengren is attached hereto as Exhibit A in support of this Motion.

WHEREFORE, Turner Construction Company and Paul Mulroney respectfully request that this Court issue an Order allowing David E. Rosengren, Esq. to be admitted *pro hac vice* for the purpose of representing Turner Construction Company in this case.

TURNER CONSTRUCTION COMPANY

By its attorney,



Paul O. Mulroney (BBO # 564785)

Pepe & Hazard LLP

225 Franklin Street, 16th Floor

Boston, MA 02110

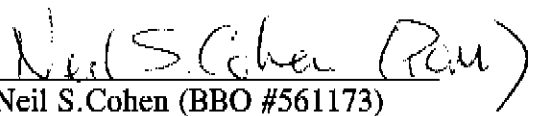
(617) 748-5500

Dated: April 16, 2004

ASSENTED TO:

MAUREEN SULLIVAN-STEMBERG.

By her attorneys,

Handwritten signature of Neil S. Cohen in cursive, with the name "Neil S. Cohen" and the initials "(PCU)" written in a stylized manner.

Neil S. Cohen (BBO #561173)

Ian S. Cherubino (BBO #636852)

Law Offices of Jeffrey S. Glassman, LLP

One Beacon Street, Suite 3333

Boston, MA 02108

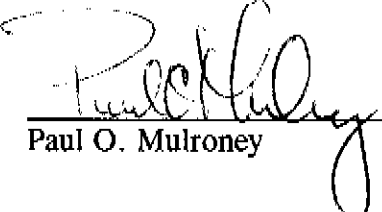
Tel: (617) 367-2900

Date: April 16, 2004

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by first class mail, postage prepaid, on counsel of record for all other parties on April 16, 2004.

Neil S. Cohen, Esq.
Ian S. Cherubino, Esq.
Law Offices of Jeffrey S. Glassman, LLP
One Beacon Street, Suite 3333
Boston, MA 02108



Paul O. Mulroney